

A. Michael Covino
BUDD LARNER, P.C.
150 John F. Kennedy Parkway
Short Hills, New Jersey 07078
(973) 379-4800
Attorneys for Applicant
Arthur Kupperman

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MERRILL LYNCH BUSINESS	:	
FINANCIAL SERVICES, INC.,	:	Civil Action No. 06-Civ-4802 (DMC)
Plaintiff,	:	
vs.	:	
ARTHUR KUPPERMAN, E. ROSS	:	DECLARATION OF ARTHUR KUPPERMAN
BROWNE, PAULETTE KRELMAN,	:	
PGB INTERNATIONAL, LLC, and	:	
JPMORGAN CHASE BANK, N.A.,	:	
Defendants,	:	

I, ARTHUR KUPPERMAN, under penalty of perjury and pursuant to 28 U.S.C. §1746, declare the following to be true:

1. I submit this declaration in support of my application for the return of my passport.
2. I am the President of IFIG USA, Inc. ("IFIG USA") IFIG USA is a broker of international food products including frozen foods, juice concentrate and other foodstuffs. As part of my responsibilities at IFIG USA, I must travel to Asia, Europe and South America to meet with product suppliers.

3. In October 2006, this Court required me to surrender my passport. Since that time I have been unable to travel outside of the United States which has impaired my ability to perform my duties at IFIG USA and to support myself. It is for this reason that I request that my passport be returned.

4. I have tried to conduct business without traveling, but it is now clear that if I am unable to meet with suppliers, inspect production facilities, etc. overseas that IFIG will soon fail as a company. The need for the return of my passport is immediate.

5. Among other things, I need to travel to China by the end of July for negotiations with a new grape juice supplier. While there I must inspect the supplier's facilities for quality and government compliance issues.

6. Similarly, I must make trips to South America to meet with potential suppliers and their representatives within the next few weeks if I am to have any chance of taking advantage of certain business opportunities. If I do not make these trips, these buying opportunities will be lost.

7. I am not a risk to flee the United States. I have very close ties to the State of New Jersey and to the United States. I am a citizen of the United States and am not a citizen of any other country. I do not hold a passport from any nation other than the United States.

8. My family is all located in the United States and is

primarily concentrated in and around New Jersey. My parents both live in West Orange, New Jersey. Both are in their late eighties and I visit them regularly.

9. My daughter, my only child, lives in Livingston, New Jersey. Her daughter, my granddaughter, lives with her.

10. I have two siblings, one of whom lives in New York City and one of whom lives in Mt. Arlington, New Jersey. I also have aunts, uncles and cousins, all of whom live in the United States.

11. I own no assets of any kind located outside of the United States. The only real property that I own is located in Hamburg, New Jersey, and currently both my real and personal property are subject to an attachment in this action.

12. Since my passport was taken, I have not left the United States.

Dated: Morristown, New Jersey
June 27, 2007



Arthur Kupperman

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